

**REMARKS**

This application has been carefully reviewed in light of the Office Action dated March 24, 2006. Claims 1-31 remain pending in this application, with claim 31 having been amended in terms which more clearly define the present invention. Claims 1, 16 and 31 are independent. Favorable reconsideration is respectfully requested.

In the Office Action, the disclosure was objected to as containing embedded hyperlinks on page 10, lines 2 and 20, and using the term “Java” without a trademark indication. As shown above, Applicants have corrected these informalities and have also added trademark designations to certain other terms. Approval of the specification is respectfully requested.

As further shown above, claim 31, which recites a plurality of means, has been amended to be directed to a system, rather than a method.

In the Office Action, claims 1-11, 13-26 and 28-31 (and possibly claim 27) were rejected as anticipated by U.S. Patent No. 6,601,233 (Underwood). Claims 12 and 27 were rejected as obvious over Underwood in view of Official Notice (specific types of adapters). Applicants respectfully traverse these rejections and submit that independent claims 1, 16 and 31 are patentably distinct from the cited prior art for the following reasons.

The present invention is directed to solving real-world inefficiencies in prior methods of writing software applications. As described in the Background on pages 2-4,

it has been the practice in large firms to use different software development teams to create software for different groups of users, even where the development projects have common requirements such as communicating with the same computer systems. Even if each team develops effective software for the same purpose, different teams are likely develop their software in different ways. Thus, not only is there duplication of effort, but the different software may be inconsistent and interfering.

Moreover, even if the developed software appears initially to be effective, software is often rewritten in patches to meet the changing requirements of the users and to handle unforeseen problems. As different users within a large organization may have different needs and/or make different demands that raise different problems, the different software developed by different teams may over time gradually drift still further apart until the overall system becomes unworkable.

A first approach that seeks to alleviate some of these problems is shown in the cited patent to Underwood. As stated in Underwood's Abstract (emphasis added):

“A method of generating software based on business components. A plurality of logical business components in a business are **first** defined with each business component having a plurality of capabilities. **Next**, functional interrelationships are identified between the logical business components. Code modules are **then** generated to carry out the capabilities of the logical business components and the functional interrelationships between the logical business components, wherein the code modules represent a transformation of the logical business components to their physical implementation, while ensuring the capabilities that are carried out by each code module are essentially unique to the logical business component associated with the code module.”

In other words, in Underwood, the process proceeds in the following order:

- (1) define the logical business components
- (2) identify the functional relationships between the already-identified logical business components
- (3) generate the code modules to carry out the capabilities of the logical business components and the functional interrelationships.

Thus, the function interrelationships are identified only *after* the logical business components are defined. Accordingly, there remains a significant area of indeterminacy in the overall program which is subject to the difficulties discussed above.

In contrast, the present invention provides an overall predetermined structure for the development of an application by selecting a pattern for the application even before the individual “artifacts” (or “logical business components,” which appear to be the similar elements in Underwood’s terminology) are designed.

More specifically, independent claim 1 is directed to a method for developing an application, comprising, as a *first* step, selecting one of a plurality of *patterns*, each of the plurality of patterns having at least one of a plurality of business artifacts.

Claim 1 then recites designing the application using the at least one of the plurality of business artifacts associated with the selected one of the plurality of patterns, generating code based on the at least one of the plurality of business artifacts, and interfacing the code with at least one platform independent service.

Applicants have carefully reviewed the portions of Underwood cited by the Office Action and have found nothing that would teach or suggest the advantageous selection of

a pattern for the application *prior* to the designing of the individual portions or “artifacts” thereof, as recited in independent claim 1.

Independent claims 16 and 31 are system claims which, like independent claim 1, recite a first selection of a pattern for the application prior to the design of the individual portions thereof.

The remaining claims depend respectively from one of independent claims 1 and 16 and partake of the novelty thereof.

In light of the foregoing amendments and remarks, Applicants respectfully submit that claims 1-31 are patentably distinct over the prior art of record.

Applicants further submit that the application is in proper form for allowance of all claims, and earnestly solicit a notice to that effect.

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Respectfully submitted,

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